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Attorney for JUSTIN FIFE

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In Re:	Case No.: 19-30088 (DM)
PG&E CORPORATION	Chapter 11
	(Lead Case)
And	(Jointly Administered)
PACIFIC GAS AND ELECTRIC COMPANY,	DECLARATION OF JUSTIN FIFE IN SUPPORT OF MOTION TO ALLOW/DEEM TIMELY LATE FILING OF PROOF OF CLAIM
Debtors.	Date: <u>Dec. 20</u> , 2022
<input type="checkbox"/> Affects PG&E Corporation	Time: 10:00 a.m.
<input type="checkbox"/> Affects Pacific Gas & Electric	Place: To be Held Telephonically
<input checked="" type="checkbox"/> Affects Both Debtors	United States Bankruptcy Court
	Courtroom 17
	450 Golden Gate Avenue, 16 th Floor
	San Francisco, CA
<i>All papers shall be filed in the Lead Case, No. 19-30088 (DM)</i>	Judge: Honorable Dennis Montali
	Objection Deadline: <u>Dec. 13</u>, 2022

I, Justin Fife, hereby declare and state as follows:

1. This declaration is based upon my personal knowledge unless otherwise indicated. If called upon to testify as to the matters stated herein, I could and could competently do so.

2. I was unaware of the technicalities of the availability of compensation, or the Fire

1 Victim Trust, or bankruptcy claim process until just days prior to submitting a Claim
2 Questionnaire to the Fire Victim Trust on July 1, 2022.

3 3. The Sonoma Complex Fires, commencing with the Tubbs Fire on October 8,
4 2017, caused my home in Rohnert Park, California, to be blanketed in smoke, causing extreme
5 emotional distress and respiratory smoke inhalation and irritation to me, my wife, and two minor
6 children.

7 4. We sheltered in place, as was recommended, and awaited any evacuation orders
8 that may be made for our zone of residence. Living with the stress and fear of the uncontrolled
9 fire and the daily possibility of receiving evacuation orders, caused extreme anxiety and tension
10 throughout our household.

11 5. We were all breathing unhealthy levels of smoke and ash causing irritation to our
12 eyes, throat, and lungs. The unhealthy air quality, together with unseasonably high temperatures
13 while living in a home with no air conditioning, created an untenable living situation for the
14 children and, especially for Clara who was an active toddler.

15 6. Additionally, our 13-month old son, Rowan, already had lung issues having been
16 diagnosed with and/or suffering from asthma, RSV lung infection, and Bronchiolitis before the
17 fires broke out. The inhalation of smoke and ash over the 23 days of fires only served to further
18 exacerbated his lung issues. Having an otherwise active toddler suffering from itchy eyes and
19 sore throat as a result of the smoke inhalation, and a sick infant suffering from lung issues as
20 well as the effects of smoke inhalation, in the home without relief of being able to enjoy fresh air
21 and sunshine caused stress, tension, and anxiety of the children's mother and my wife, Kristen.

22 7. Since the cessation of the fire storm of 2017, in addition to the physical
23 symptoms, my wife Kristen has experienced anxiety and fear similar to PTSD whenever she
24 hears the wind howling, fire truck sirens, when she gets a fire alert notification on her phone, or
25 if the weather is forecasted to be hot and windy.

26 8. In the last several days of June 2022, I was informed by a friend that the Fire
27 Victim Trust may offer compensation to me.
28


9. On July 1, 2022, I submitted a Claims Questionnaire to the Fire Victim Trust for myself, my wife, Kristin, and my two minor children, Rowan and Clara. On or about July 25, 2022, a Determination Notice from the Claims Processor for the Fire Victim Trust accepted our claim and proposed a settlement offer for the submitted Claims Questionnaire. Subsequently, on July 29, 2022, an ACH payment was made to and received by myself, Justin Fife, and my wife, Kristen Fife in the amount of \$18,000.00 each in full settlement of our claims.

10. Prior to receiving the funds, I was assured by the Fire Victim Trust that no further paperwork would be required and it wasn't until after our claims had been accepted and payment made to me and my wife, that the Fire Victim Trust informed me that I would need to make a claim in the bankruptcy court.

11. I request the court grant our petition so we may retain the settlement.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed at Rohnert Park, California on October 23, 2022.


Justin Fife